

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO**

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|------------------|---|---------------------------|
| JOHN DOE, |) | |
| |) | |
| |) | |
| Plaintiff, |) | Case No. 1:17-cv-01335 |
| |) | |
| v. |) | |
| |) | Judge Solomon Oliver, Jr. |
| OBERLIN COLLEGE, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

DECLARATION OF CHRISTOPHER C. MUHA

I, Christopher C. Muha, hereby declare as follows:

1. On January 10, 2018, John Doe, Justin Dillon and I became aware of a YouTube video of a panel at a conference hosted by the American Constitution Society on which Meredith Raimondo made comments about the enforcement of Title IX at Oberlin College. Despite having uncovered various print statements by Ms. Raimondo about her implementation of Title IX at Oberlin, we were not aware of the existence of this video before that day.

2. After it was decided to amend the complaint, we removed Mr. Doe's claim for Negligent Infliction of Emotional Distress because Mr. Doe had already abandoned that claim in his opposition to Oberlin's Motion to Dismiss. *See* Dkt. No. 12 at 3 n. 1. We also decided to fold Mr. Doe's claim for Breach of the Covenant of Good Faith and Fair Dealing into his claim for Breach of Contract.

3. Attached as Exhibit 2 to John Doe's Motion for Leave to File Amended Complaint is a true and correct copy of an email I sent to David Wallace, counsel for Oberlin College, on January 26, 2018.

I affirm under penalty of perjury that the foregoing is true to the best of my recollection and is based on personal knowledge.

DATED: February 7, 2018

/s/ Christopher C. Muha

Christopher C. Muha (Ohio Bar No. 0083080)

Attorney for Plaintiff John Doe